

product was sold, including, but not limited to, type of package, size, color and writings thereon.

RESPONSE:

See General Objections Nos. 1-8. Union Carbide further objects to this Interrogatory on the ground that it is overly broad. Subject to its objections, Union Carbide responds as follows:

Calidria asbestos was packaged and transported in plastic or Kraft type paper bags, although some Calidria was shipped in bulk in railroad hopper cars. Each bag contained the following information: Union Carbide's corporate name and address, the net weight of material supplied, the applicable grade of asbestos, the lot number identification, and a warning label beginning in 1968, four years before Federal OSHA standards were promulgated to require a warning. At the request of some customers, a very small amount of Calidria asbestos was sold in plain Kraft bags, which contained only the warning label. Between August 1975 and June 1985 as a practice, all Kraft bags containing Calidria asbestos were individually shrink wrapped (encased by a tight fitting plastic film) and an entire pallet containing a number of such bags was also completely covered with the tight fitting plastic film. Examples of certain bags and the warning labels utilized on all bags of Calidria asbestos are available in the repositories maintained by Union Carbide's counsel.

Phenolic resins and phenolic molding compounds were commonly packaged in bags, gaylords or drums. In particular, the phenolic molding compounds were sold in granulated form and typically packaged in fifty pound bags. Examples of the labels affixed to certain bags of phenolic molding compound are available in the document repositories maintained by Union Carbide's counsel.

To the extent that additional information responsive to this Interrogatory is in the possession of Union Carbide, this information is located in the repositories maintained by Union Carbide's counsel.

INTERROGATORY NO. 28: For each subpart below, state whether or not, to Defendant's knowledge, any items as described therein presently exist and, if so, identify any and all such existing items and state the present location of each:

- (a) any product listed in response to Interrogatory No. 19, including, but not limited to, any sample, part or piece thereof;
- (b) any package of the type in which any or all of the products listed in response to Interrogatory No. 19 were or would have been sold, including, but not limited to, any partial package;
- (c) any catalogue, brochure, sales literature or like item referring to, relating to or reflecting any or all of the products listed in response to Interrogatory No. 19;
- (d) any picture, drawing, photograph or like representation of the items described in subparts (a), (b) and/or (c) of this Interrogatory.

RESPONSE: